



July 28, 2023

**Re: Agency Information Collection Activities; Proposals, Submissions, and Approvals:
Automated Vehicle Transparency and Engagement for Safe Testing Initiative**

Beep welcomes the opportunity to offer our perspective on the National Highway Traffic Safety Administration's (NHTSA) Automated Vehicle Transparency and Engagement for Safe Testing (AV TEST) Initiative. As one of the first and most active participants in this voluntary program, we want to share our observations for how NHTSA can add value to this information-sharing tool as the industry continues to evolve.

We believe the industry at large would benefit from the following adjustments:

Explication of operational learnings. The development of autonomous technology and understanding of its operational application advances on parallel tracks. It would be useful to understand the evolution of these paths across use cases to ensure progress on the technology track is keeping pace with real-world customer experience improvements on the operational track.

Best practices related to community engagement efforts. It is critical to engage first responders, potential ridership, and community advocates on the front end of an autonomous deployment to promote the benefits, understand potential obstacles, and ensure a consistent understanding of critical dependencies across stakeholders. Leveraging AV TEST to highlight best practices may provide a roadmap for the non-operational side of service planning.

Deeper description of categorical use cases. AV TEST has the potential to provide a menu of options for communities interested in deploying autonomous mobility as a service and introduce them to creative ideas that have not previously been considered.

Specific testing purposes and outcomes. An abstract that includes both a before- and after-action report that includes both identified goals and results may help shape how communities approach autonomous deployments and level-set expectations.

We believe the sharing of best practices and operational learnings have been key to the expansion of testing and demonstration pilots and will be critical as we move toward broader deployment and full integration of autonomous mobility services. To that end, we are encouraged by recent steps NHTSA has taken to safely and responsibly advance autonomous mobility innovation, specifically through establishing the Office of Automation Safety and announcing the upcoming AV STEP rulemaking process.

We value NHTSA's collaborative and transparent approach and look forward to contributing to the discussion around a final AV STEP rule that will prioritize safety while allowing the United States to reassert itself as the world leader in autonomous innovation, creating new jobs and enabling mobility freedom for all.

Sincerely,



Joe Moyer
CEO, Beep